

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

**ALBERT BARNES,**

Plaintiff,

vs.

**GIRLS GALORE, INC. d/b/a BLISS**

**ATLANTA** et al.,

Defendants.

Civil Action No. 1:14-CV-3946-SCJ

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**RESPONSE IN OPPOSITION TO THE MOTION TO DISMISS BY GEORGE NAZERIAN**

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Plaintiff Albert Barnes responds in opposition to the Motion to Dismiss [Dkt. 11] filed by Defendant George Nazerian pursuant to Federal Rules of Civil Procedures 12(b)(1) and (6), showing the Court as follows:

1.

Defendant Nazerian's Motion to Dismiss incorporates the Motion to Dismiss previously filed by Defendant Girls Galore, Inc. d/b/a Bliss Atlanta [Dkt. 7], which is currently pending before this Court.

2.

Defendant Nazerian raises no arguments not previously raised in the Motion to Dismiss by Girls Galore, Inc.

3.

Plaintiff has fully responded to the Motion to Dismiss of Girls Galore, Inc. with its Response in Opposition to the Motion to Dismiss by Girls Galore, Inc. d/b/a Bliss Atlanta. [Dkt. 10]

4.

Therefore, Plaintiff hereby incorporates his Response in Opposition to the Motion to Dismiss by Girls Galore, Inc. d/b/a Bliss Atlanta and the Declaration of William F. Wynn. [Dkt. 10-1]

5.

Plaintiff further submits in support of his Response the Declaration of Andrew J. Holland, former General Manager of Girls Galore, Inc. d/b/a Tease (the current trade name of Defendant Girls Galore). Exhibit 1.

6.

For the foregoing reasons, Plaintiff requests that this Court DENY Defendant Nazerian's Motion to Dismiss.

This 30th day of March 2015.

Respectfully submitted,

**DELONG CALDWELL BRIDGERS  
& FITZPATRICK, LLC**

/s/ Kevin D. Fitzpatrick, Jr.

Kevin D. Fitzpatrick, Jr.

Georgia Bar No. 262375

/s/ Charles R. Bridgers

Charles R. Bridgers

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**COUNSEL FOR PLAINTIFFS**

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**CERTIFICATION OF COMPLIANCE AND CERTIFICATE OF SERVICE**

I hereby certify pursuant to LR 7.1 that the foregoing document has been prepared in Times New Roman 14 point font, which is one of the font and point selections approved by the court in LR 5.1C.

I further certify that on this day I filed the foregoing document in the Court's CM/ECF system, thereby ensuring delivery by electronic mail upon all counsel of record.

Dated: March 30, 2015.

/s/ Matthew W. Herrington

Matthew W. Herrington  
Georgia Bar No. 275411